



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

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February 4, 2016

Mr. Daniel Oliveira
US Tsubaki Automotive, LLC
106 Lonczak Drive
Chicopee, MA 01022

RE: CHICOPEE
Transmittal No.: X268234
Application No.: WE-15-020
Class: *SM-25*
FMF No.: 282101
AIR QUALITY PLAN APPROVAL

Dear Mr. Oliveira:

The Massachusetts Department of Environmental Protection (“MassDEP”) Bureau of Air and Waste has reviewed your Limited Plan Application (“Application”) listed above. This Application concerns the proposed alteration and/or operation of the Chain Assembly and Cleaning Processes at your manufacturing facility located at 106 Lonczak Drive in Chicopee, Massachusetts (“Facility”).

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 “Air Pollution Control,” regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-J, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP’s review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator (“Permittee”) must comply in order for the Facility to be operated in compliance with this Plan Approval.

1. DESCRIPTION OF FACILITY AND APPLICATION

U.S. Tsubaki Automotive, LLC (hereinafter "Permittee"), located at 106 Lonczak Drive, in Chicopee is a manufacturing company primarily engaged in the manufacture of drive chains for the automotive industry. The Permittee utilizes various petroleum based oils and cleaning materials for the purpose of metal parts cleaning and to minimize corrosion of metal in their Chain Assembly and Cleaning Processes. These materials contain volatile organic compounds ("VOCs").

MassDEP issued on July 17, 2014 a Limited Plan Approval to U.S. Tsubaki Automotive, LLC for replacement of a high 80% ("VOC") content rust preventative oil with lower oil containing 53% VOCs, merging of five of their sixteen chain assembly machines into two separate emission units, and establishing emission limits for the manual parts cleaning operations at their facility. This Limited Plan Approval limited facility-wide emissions to 2 tons per month and 9.5 tons per year for total VOCs. In this Limited Plan Application, U.S. Tsubaki Automotive, LLC is requesting an increase in the emission limits for the manual parts cleaning solvents to 0.42 tons per month and 4.0 tons per year and an increase in facility-wide emissions limits to 2.5 tons per month and 12.5 tons per year (12-month rolling) citing recent usage and projected growth.

There are sixteen (16) Chain Assembly Machines in operation at the Permittee's facility. In accordance with 310 CMR 7.00, equipment installed at the same facility, for the same process, with an installation date within one year of each other, must be assessed together as one process for potential VOC emissions and air permitting. Therefore, Chain Assembly Machines 5, 6, and 7 are combined into a single emission unit and identified as EU 01. Chain Assembly Machines 8 and 9 are combined into another emission unit and identified as EU 02.

The facility has four (4) vacuum degreasers that replaced the Safety Kleen cold degreasers permitted as part of NMCPA 1-P-01-057 TR #W019144 (dated 2/25/2002). The vacuum degreasing process consists of a close-looped, stand-alone mechanical parts washing system which uses Daphne Cleaner NH-U to wash oil and grease off the steel parts. Each vacuum degreasers potential to emit is below the 1 ton per year threshold.

The Permittee uses cleaning products that contain no hazardous air pollutants ("HAPs"), in their cleaning process. Several miscellaneous contact cleaners are hand applied to manufactured parts in the tensioner department to remove excess grease from parts. Based on recent usage of 719 gallons per year, the Permittee proposes to increase the amount of contact cleaners to 1200 gallons per year and increase the air contaminant emissions from hand applied contact cleaners to 4.0 tons per year of VOCs.

The Permittee continues to operate endothermic gas generators, rotary furnaces, reheat furnaces and a belt furnace for the purpose of heat treating metals in various stages within the manufacturing process. The fuel utilization equipment is exempt under 310 CMR 7.02(2)15 since all have maximum energy input below 10 MMBtu/hr utilizing propane as fuel.

Regulatory Applicability

Best Available Control Technology (“BACT”)

The Permittee proposes the use of a combination of best management practices, pollution prevention and a limitation on the hours of operation and /or raw material usage. The Permittee will minimize VOC and HAP emissions from their operations by limiting the VOC and HAP contents of coatings/materials, limiting the usage of VOC and HAP-containing coatings/materials and implementing work practices which minimize the evaporation of VOCs and HAPs.

Please be advised that this FINAL APPROVAL modifies Plan Approval WE-14-011, TR #X257314 (dated 7/17/2014) and all previous approvals for the MassDEP regulated air pollution sources at US Tsubaki Automotive, LLC.

2. EMISSION UNIT (EU) IDENTIFICATION

Each Emission Unit (EU) identified in Table 1 is subject to and regulated by this Plan Approval:

Table 1			
EU#	Description	Design Capacity	Pollution Control Device (PCD)
3	Miscellaneous Solvent use for Clean-Up Operations	N/A	None

Table 1 Key:

EU# = Emission Unit Number

PCD = Pollution Control Device

3. APPLICABLE REQUIREMENTS

A. OPERATIONAL, PRODUCTION and EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2 below:

Table 2			
EU#	Operational / Production Limit	Air Contaminant	Emission Limit ¹
3	91 Gal. Lacquer Thinner ³ per Month/ 709 Gal. Lacquer Thinner ³ per 12-month rolling period	VOC	0.30 TPM 2.6 TPY
	125 Gal. Miscellaneous Contact Cleaners ⁴ per Month/ 1200 Gal. Miscellaneous Contact Cleaners ⁴ per 12-month rolling period.		0.42 TPM 4.0 TPY
Facility -wide	None	Total HAPs ²	0.125 TPM 1.0 TPY
		Total VOCs	2.5 TPM 12.5 TPY

Table 2 Key:

EU# = Emission Unit Number

Gal. = gallons

VOC = Volatile Organic Compounds

HAP (single) = maximum single Hazardous Air
Pollutant

HAPs (total) = total Hazardous Air Pollutants.

TPM = tons per month

TPY = tons per consecutive 12-month period

Table 2 Notes:

¹ = Emission limits expressed as tons per year (TPY) are based on a rolling 12-month total.

² = All HAP restrictions are for both individual and combined HAPs.

³ = Lacquer Thinner VOC content shall not exceed 6.53 pounds VOC per gallon applied and 30 percent HAP by weight.

⁴ = Miscellaneous Contact Cleaners shall not exceed 6.63 pounds VOC per gallon applied and 0 percent HAP by weight.

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5 below:

Table 3	
EU#	Monitoring and Testing Requirements
3	1. The Permittee shall monitor material usage on a monthly basis such that records can be maintained of the Facility's emissions of VOCs and HAPs to determine compliance with the emission limits in Table 2 above.
Facility-wide	2. The Permittee shall establish and maintain a calendar month record of all process oils and degreasing solvents used and the manufacturer's formulation data used for determining VOC content.
	3. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13

Table 3 Key:

EU# = Emission Unit Number

VOC = Volatile Organic Compound

HAP = Hazardous Air Pollutants

MassDEP = Massachusetts Dept. of Environmental Protection

USEPA = United States Environmental Protection Agency

Table 4	
EU#	Record Keeping Requirements
3	1. The Permittee shall prepare and maintain daily records sufficient to demonstrate compliance with the limits contained in this Plan Approval. Such records shall include, but are not limited to: <ol style="list-style-type: none"> identity, quantity, formulation and density of coating(s) used; identity, quantity, formulation and density of any diluent(s) and clean-up solvent(s) used; solids content of any coating(s) used;
Facility-wide	2. The Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve month period (current month plus prior eleven months). These records shall be compiled no later than the 15 th day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/dep/air/approvals/aqforms.htm#report .
	3. The Permittee shall maintain records of monitoring and testing as required by Table 3.

Table 4	
EU#	Record Keeping Requirements
	4. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU(s) approved herein on-site.
Facility-wide (cont')	5. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s) and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	6. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s) and monitoring equipment. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.
	7. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	8. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

Table 4 Key:

EU# = Emission Unit Number

PCD = Pollution Control Device

*SOMP = Standard Operating and Maintenance
Procedure*

*MassDEP = Massachusetts Dept. of Environmental
Protection*

*USEPA = United States Environmental Protection
Agency*

Table 5	
EU#	Reporting Requirements
Facility-wide	1. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a "Responsible Official" as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	2. The Permittee shall notify the Western Regional Office of MassDEP, BWP Permit Chief by telephone (413) 755-2115, email, <i>Marc.Simpson@state.ma.us</i> or fax (413) 784-1149, as soon as possible, but no later than one (1) business day after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to Permit Chief at MassDEP within three (3) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).

Table 5	
EU#	Reporting Requirements
	3. The Permittee shall submit after the end of each calendar year (by January 31 of each year) the previous twelve (12) monthly reports, in accordance with provisions 1 and 4 of Table 4 of this Approval. At a minimum, the information shall include the calculated facility emissions of VOC and HAP for the month as well as the prior 11 months. An example of a format that is acceptable to MassDEP is the On-Site Record Keeping Form, which can be downloaded at http://www.mass.gov/dep/air/approvals/reshome.htm .
Facility-wide (cont')	4. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30-days from MassDEP's request.
	5. The Permittee shall submit to MassDEP for approval a stack emission pretest protocol, at least 30 days prior to emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.
	6. The Permittee shall submit to MassDEP a final stack emission test results report, within 45 days after emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.

Table 5 Key:

EU# = Emission Unit Number

VOC = Volatile Organic Compound

HAP = Hazardous Air Pollutant

CMR = Code of Massachusetts Regulations

MassDEP = Massachusetts Dept. of Environmental Protection

4. SPECIAL TERMS AND CONDITIONS

The Permittee is subject to, and shall comply with, the following special terms and conditions:

- A. The Permittee shall comply with the Special Terms and Conditions as contained in Table 6 below:

Table 6	
EU#	Special Terms and Conditions
3	1. The Permittee shall meet the following cleanup solution standards: <ul style="list-style-type: none"> a. cleanup solution shall be kept in covered containers during transport and storage; b. shop towels contaminated with cleanup solution shall be kept, when not in use, in covered containers; and c. Tsubaki shall maintain records of cleanup solution VOC and HAP content and usage to demonstrate compliance with Table 3 requirements of this Approval.

Table 6	
EU#	Special Terms and Conditions
Facility-wide	<p>2. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the Permittee shall comply with the following work practices:</p> <ul style="list-style-type: none"> a. Store all VOC and/or HAP-containing materials, process-related waste materials and fresh and spent cleaning solvents in closed containers; b. ensure that mixing and storage containers used for VOC and/or HAP-containing materials and process-related waste materials are kept closed at all times except when depositing or removing these materials; c. minimize spills of VOC and/or HAP-containing materials and process-related waste materials; d. convey VOC and/or HAP-containing materials and process-related waste materials from one location to another in closed containers or pipes; e. minimize VOC and/or HAP emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that: (i) equipment cleaning is performed without atomizing the cleanup solvent; and, (ii) all spent solvent is captured in closed containers; and f. store and dispose of all absorbent materials, such as cloth or paper, that are contaminated with VOC and/or HAP-containing materials and process-related waste materials in non-absorbent containers that shall be kept closed except when placing materials in or removing materials from the container.
	<p>3. Opacity, exclusive of uncombined water, shall not exceed 10% at all times during all modes of operation, including startups and shutdowns. Visible emissions or opacity which exceeds the limits set forth in this Approval shall be reported to MassDEP in writing or by fax within three (3) business days of the occurrence.</p>
	<p>4. Noise from the facility during routine operation, including startups and shutdowns, shall not exceed MassDEP noise guidelines and shall not cause a condition of air pollution as defined in 310 CMR 7.01 and 7.10.</p>
	<p>5. The facility shall be constructed and operated in a manner to prevent the occurrence of dust and odor conditions which cause or contribute to a condition of air pollution as defined in 310 CMR 7.01 and 7.09.</p>
	<p>6. Any prior Plan Approvals issued under 310 CMR 7.02 shall remain in effect unless specifically changed or superseded by this Plan Approval. The Facility shall not exceed the emission limits and shall comply with approved conditions specified in the prior Plan Approval(s) unless specifically altered by this Plan Approval.</p>

Table 6 Key:

EU# = Emission Unit Number
VOC = Volatile Organic Compound
HAP = Hazardous Air Pollutant
% = Percent

CMR = Code of Massachusetts Regulations
MassDEP = Massachusetts Dept. of Environmental Protection

- B. The Permittee shall install and use an exhaust stack, as required in Table 7, on each of the Emission Units that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Each exhaust stack

shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including but not limited to rain protection devices known as “shanty caps” and “egg beaters.” The Permittee shall install and utilize exhaust stacks with the following parameters, as contained in Table 7 below, for the Emission Units that are regulated by this Plan Approval:

Table 7				
EU#	Stack Height Above Ground (feet)	Stack Inside Exit Dimensions (feet)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)
1	N/A	N/A	N/A	N/A
2	N/A	N/A	N/A	N/A

Table 7 Key:

EU# = Emission Unit Number

°F = Degree Fahrenheit

N/A= Not Applicable

5. GENERAL CONDITIONS

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.
- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.

- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.
- J. The Permittee shall conduct emission testing, if requested by MassDEP, in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13. If required, a pretest protocol report shall be submitted to MassDEP at least 30 days prior to emission testing and the final test results report shall be submitted within 45 days after emission testing.
- K. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions," which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

7. APPEAL PROCESS

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Enclosed is a stamped approved copy of the application submittal.

Should you have any questions concerning this Plan Approval, please contact Todd Wheeler by telephone at (413) 755-2297, or in writing at the letterhead address.

This final document copy is being provided to you electronically by the
Department of Environmental Protection. A signed copy of this document
is on file at the DEP office listed on the letterhead.

Marc Simpson
Permit Chief
Bureau of Waste Prevention

Enclosure

ecc: MassDEP/Boston - Yi Tian
MassDEP/WERO - Peter Czapienski
Tighe & Bond – Timothy Keefe